

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

GARY SUOJA, Individually and as Special)	
Administrator of the Estate of OSWALD)	
SUOJA, Deceased,)	
)	
Plaintiff,)	Case No. 99-cv-475-bbc
)	
v.)	
)	
Owens-Illinois, Inc.,)	
)	
Defendant.)	

Motion for Protective order and leave to file documents for in camera review

Plaintiff moves this court for a protective order allowing filing of documents for in camera review, if needed, by the court. The documents relate to the objections to discovery based on attorney client privilege. The privileged documents are referenced in the discovery responses dated May 28, 2015, served in response to discovery requests of Owens-Illinois. (Exs. 1 and 2) The documents are an email from plaintiff Gary Suoja to Robert G. McCoy on December 18, 2014, and an email from Robert G. McCoy to Michael P. Cascino on December 19, 2014, and relate to the alleged settlement agreement which this court allowed discovery for. (Exs. 1 and 2). The protective order and in camera review are sought because the documents contain privileged information unrelated to question of the enforcement of the alleged settlement agreement. As a result of the privileged communications on which discovery has not been allowed, plaintiff provides the documents for in camera review to protect the privilege.

Relief requested

Plaintiff moves the court for a protective order allowing filing of documents referred to in discovery responses by plaintiff to Owens-Illinois dated May 28, 2015, for the purpose of in camera review as necessary to protect the attorney client privilege..

Dated: June 1, 2015

/S/ Robert G. McCoy
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